



SpencerFane™

ERIK O. SOLVERUD
DIRECT DIAL: 314.333.3904
esolverud@spencerfane.com

File No. 5024751-0003

May 6, 2016

VIA ELECTRONIC MAIL

Stephen R. Clark
Runnymede Law Group
7733 Forsyth Boulevard, Suite 625
St. Louis, MO 63105

Re: Anne Schlafly Cori, et al. v. Edward R. Martin, et al.

Dear Steve:

We understand that, since at least April 10, 2016, the Runnymede Law Group has professed to be counsel to Eagle Forum 501(c)(4). Indeed, you and the Runnymede Law Group have entered their appearance on behalf of Eagle Forum 501(c)(4) in the above-referenced litigation, and continue to hold yourselves out as counsel to the organization.

On behalf of the following members of the Board of Directors of Eagle Forum 501(c)(4), including Anne Schlafly Cori, Eunie Smith, Cathie Adams, Carolyn McLarty, Rosina Kovar and Shirley Curry (the "Majority Directors"), we hereby request that you and the Runnymede Law Group provide us with copies of the following materials related to your representation of Eagle Forum 501(c)(4):

1. Any engagement letter(s), disclosures and conflict waivers related to Runnymede Law Group's representation of Eagle Forum 501(c)(4) or any of its officers, directors or employees;
2. All documents prepared, created, or obtained by Runnymede Law Group in connection with its representation of Eagle Forum 501(c)(4), including memoranda, correspondence and communications, and all drafts thereof;
3. All correspondence and communications between Runnymede Law Group and its attorneys, on the one hand, and any of the following individuals or entities, on the other hand, related to either Eagle Forum 501(c)(4), the April 11th Board of Directors Meeting, or the above-referenced litigation: Phyllis Schlafly, John Schlafly, Andy Schlafly, Ed Martin and any other officers, directors or employees of Eagle Forum 501(c)(4) or any entity associated or affiliated in any way with Eagle Forum; and
4. All communications between Runnymede Law Group and its attorneys and any media outlet, reporter or member of press related to Eagle Forum 501(c)(4).

SL 1912011.1



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As you know, per the Eagle Forum Bylaws, "[a]ll powers of the organization shall be exercised by the Board of Directors." Notwithstanding the current dispute, the Majority Directors were, and remain, members of the Eagle Forum Board of Directors during the entire time period during which the Runnymede Law Group claims to have been engaged to represent Eagle Forum 501(c)(4). Accordingly, there is no legitimate basis upon which the Runnymede Law Group can assert the attorney-client privilege and/or attorney work product protections against the Majority Directors. See *Kirby v. Kirby*, 1987 WL 14862, at *1 (Del. Ch. July 29, 1987) (finding that the attorney-client privilege may not be invoked by a corporation against those who were directors at the time the documents were prepared); *Gottlieb v. Wiles*, 143 F.R.D. 241, 247 (D. Colo. 1992) (finding that directors are not precluded by the attorney-client privilege or work product doctrine from inspecting documents generated during their tenure); *AOC Ltd. P'ship v. Horsham Corp.*, 1992 WL 97220, at *1 (Del. Ch. May 5, 1992) (noting that plaintiffs, who comprised two board members, were "just as much the 'client'" as defendant corporation and, therefore, should have access to the same information to which defendants have access with respect to legal advice").

As you know, time is of the essence. Please let me know right away whether you and the Runnymede Law Group will provide us with the requested documents and materials.

Regards,

Erik O. Solverud

EOS/mmd



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ERIK O. SOLVERUD
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File No. 5024751-0003

May 9, 2016

VIA ELECTRONIC MAIL

Stephen R. Clark
Runnymede Law Group
7733 Forsyth Boulevard, Suite 625
St. Louis, MO 63105
sclark@runnymedelaw.com

Re: Anne Schlafly Cori, et al. v. Edward R. Martin, et al.

Dear Steve:

Since April 10, 2016, the Runnymede Law Group has professed to be counsel to Eagle Forum 501(c)(4), and has entered an appearance on behalf of Eagle Forum 501(c)(4) in the above-referenced litigation.

In your purported capacity as counsel to Eagle Forum 501(c)(4), we previously made you aware of an e-mail sent by Andy Schlafly on Wednesday, May 4, 2016 to an undisclosed mailing list.¹ The e-mail is riddled with misleading and flatly inaccurate characterizations of the parties' dispute and the above-referenced lawsuit, including a labored attempt to "spin" the Temporary Restraining Order recently entered by the Court.

The purpose of this letter is to make sure that Runnymede Law Group, as counsel to Eagle Forum 501(c)(4), has advised the various officers, agents, employees and representatives, including Andy Schlafly, who is a director of Eagle Forum 501(c)(4), of the Court's express admonition to the parties at the TRO hearing to refrain from further communications with the press and posts on social media about the parties' dispute.

As you know, Illinois statute provides that "every restraining order ... is binding only upon the parties to the action, **their officers, agents, employees, and attorneys, and upon those persons in active concert or participation with them** who receive actual notice of the order by personal service or otherwise." 735 Ill. Comp. Stat. Ann. 5/11-101 (emphasis added). Like a restraining order, we believe the Court's admonition to the parties applies to all officers, directors, agents, employees and representatives of Eagle Forum 501(c)(4).

¹ The e-mail states that Andy Schlafly has "been getting inquiries by Eagle Forum members for an update, and members should be informed." We take this statement to mean that Andy Schlafly has sent an e-mail blast to the entire Eagle Forum mailing list, which numbers in the tens of thousands.

SL 1912040.2

Stephen R. Clark
May 9, 2016
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On behalf of the Majority Directors of Eagle Forum 501(c)(4), we urge you, as part of your professional obligations to the Eagle Forum 501(c)(4), to advise *all* officers, directors, agents, employees and representatives of Eagle Forum 501(c)(4) to cease and desist any efforts to strategically disseminate or "leak" misleading narratives to the public, or otherwise try to "spin" the Court's rulings in this case. Such conduct directly contravenes the warning issued by the Court, harms Eagle Forum 501(c)(4) and further damages its good name and reputation, which individuals such as Andy Schlafly, in particular, are duty-bound to protect. See Eagle Forum Bylaws (providing that "[t]he Board of Directors shall protect the name 'Eagle Forum'").

Regards,

Erik O. Solverud

EOS/mmd



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File No. 5024751-0003

August 19, 2016

VIA ELECTRONIC MAIL

Stephen R. Clark
Joel Rohlf
Runnymede Law Group
7733 Forsyth Blvd., Suite 625
St. Louis, MO 63105

Re: Anne Schlafly Cori, et al. v. Edward R. Martin, Jr., et al.

Dear Steve and Joel:

As you know, the Eagle Forum Bylaws entrust the Board of Directors with authority over State Eagle Forums. See Bylaws, Article Eight – State Eagle Forums. Among other things, only the Board of Directors may charter or disband a State Eagle Forum, and a State President cannot be removed without the concurrence of the Board of Directors.

Notwithstanding the foregoing, without ever consulting with, or obtaining authority from, the Eagle Forum Board of Directors, Phyllis Schlafly and Ed Martin have started making threats against certain State Eagle Forums and State Leaders. Among other things, the State Eagle Forums and State Leaders have been led to believe that Phyllis Schlafly must expressly approve of their organization in order for them to continue to operate as a State Eagle Forum. Even more disturbing, however, are more recent statements made by Ed Martin and Phyllis Schlafly indicating that, unless they do something to stop the current litigation (which Ed Martin describes as a “renewed call to action”), these State Leaders and State Eagle Forums will be prevented from continuing their operations and could even be subject to a claim for damages by Phyllis Schlafly.

These actions are deeply troubling. They not only contradict the express terms of the Bylaws, but also violate the clear mandate of the Court’s Temporary Restraining Order, which was intended to maintain the status quo. Further, using Eagle Forum mailing lists and resources to undermine the Board of Directors’ authority is highly improper.

As counsel to Eagle Forum, the Runnymede Law Group must take immediate action to prevent such communications from being issued by its purported President and Chairman, remedy the damage that has already been inflicted by the irresponsible actions of a handful of misguided individuals, and ensure that Eagle Forum does not sustain any further damage.

SL 2023614.1



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Stephen R. Clark
Joel Rohlf
August 19, 2016
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Please immediately confirm your receipt of this letter and explain how you plan to address these issues on behalf of your client, Eagle Forum.

Sincerely yours,

Erik O. Solverud

EOS/mmd



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File No. 5024751-0003

August 24, 2016

VIA ELECTRONIC MAIL

Stephen R. Clark
Joel Rohlif
Runnymede Law Group
7733 Forsyth Blvd., Suite 625
St. Louis, MO 63105

Re: Anne Schlafly Cori, et al. v. Edward R. Martin, Jr., et al.

Dear Steve and Joel:

As you are both well aware, the Court entered its Temporary Restraining Order in this matter on April 29, 2016 ("TRO Order"). The clear mandate of the TRO Order was to preserve the status quo with respect to the operations of Eagle Forum. Eagle Forum admitted as much in its statement in support of Ed Martin's motion to compel salary payments, which relied on the fact that the TRO Order did not expressly remove Martin as President of Eagle Forum and that Martin was allegedly continuing to perform his duties as President of Eagle Forum. Likewise, in granting Ed Martin's motion to compel salary payments, the Court made clear that its TRO Order was intended to maintain the status quo pending a hearing on the merits.

In similar fashion, the TRO Order did not impact Plaintiffs' positions as Directors and Officers of Eagle Forum, nor abrogate or diminish in any way the powers and fiduciary duties that attend such positions. In fact, by enjoining Eagle Forum from attempting to elect a successor to the position of the At-Large Director, in clear violation of the Bylaws, the TRO Order mandated that the power and composition of the Board of Directors of Eagle Forum was to remain intact as part of the status quo.

Plaintiffs have attempted, in earnest, to continue to honor and perform their duties owed to Eagle Forum. However, despite the Court's TRO Order and Eagle Forum's interpretation of the same with regard to Martin, Plaintiffs have been and continue to be systematically excluded from all activities and operations of Eagle Forum. With the exception of being provided access to bank account statements and a weekly report of deposits, Plaintiffs efforts to obtain meaningful information about Eagle Forum's fundraising activities and events hosted and/or sponsored by Eagle Forum, including the upcoming Eagle Council, have largely been ignored by those individuals whose job duties include responding to inquiries by Eagle Forum's Directors and Officers. For example, Plaintiffs' requests for information about the upcoming 2016 Eagle Council, including the registration list, have been either refused or ignored.

SL 2025783.1



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Joel Rohlf
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Page 2

Efforts by certain Officers or Directors of Eagle Forum to exclude Plaintiffs from Eagle Forum because they have expressed disagreement with the manner in which Eagle Forum has been governed and operated is entirely improper under basic principles of corporate governance and ultimately harms Eagle Forum, to which *all* Directors owe fiduciary duties. This is not how the Bylaws intended Eagle Forum to operate and violates the status quo intended to be preserved by the TRO Order. Indeed, the Court's TRO Order sought to enjoin defendants from obstructing Plaintiffs in the performance of their fiduciary duties by, among other things, ensuring that Plaintiffs had access to the records and property of Eagle Forum.

Separate and apart from the pending litigation, there can be no question that a Director of Eagle Forum, acting pursuant to the powers and duties impressed upon her by the Bylaws and the laws of the State of Illinois, must be allowed access to such information as is necessary to understand the operations, fundraising activities and finances of Eagle Forum, and the opportunity to have meaningful input and collaboration regarding the same. Stated differently, Plaintiffs are no less a part of Eagle Forum than the individuals who have sought to deny them access to Eagle Forum's offices and otherwise cut them out at every turn; this false dichotomy needs to be immediately abandoned so that the *mission* of Eagle Forum can once again become the focus of all those who are duty-bound to protect it.

Please understand that Plaintiffs view any attempt to prevent Plaintiffs or Eagle Forum State Leaders from participation in the upcoming 2016 Eagle Council as completely inconsistent with maintaining the status quo and a violation of the TRO Order. Indeed, Anne Schlafly Cori and Eunie Smith are members of the Eagle Council Steering Committee, together with Pat Andrews, Lois Linton and others. Eagle Council has always been sponsored, organized and coordinated by Eagle Forum, and has constituted the primary meeting of the various members and supporters of Eagle Forum, as well as the many Eagle Forum State Leaders. At Eagle Council, Eagle Forum State Leaders typically provide 3-minute State Leaders reports. Also, at Eagle Council, Eagle Forum has always announced the annual list of Eagle Award winners and the Honor Roll, recognizing and honoring those individuals who have built Eagle Forum's success. Further, the annual Eagle Forum Board of Directors meeting has always been conducted as part of Eagle Council.

Recently, we have heard rumors of an effort to conduct Eagle Council without the involvement of Eagle Forum, certain Eagle Forum Officers, Directors and members, or State Eagle Forum Leaders. Please promptly acknowledge your receipt of this letter and confirm that the 2016 Eagle Council will be conducted consistent with the status quo and in the same manner in which it has always been conducted in the past.



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Absent a satisfactory response to this request, Plaintiffs will have little choice but to immediately pursue the Court's further involvement in this matter. Hopefully, this can be avoided.

Sincerely yours,

Erik O. Solverud

EOS/mmd



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File No. 5024751-0003

September 21, 2016

VIA ELECTRONIC MAIL

Stephen R. Clark
Runnymede Law Group
7733 Forsyth Blvd., Suite 625
St. Louis, MO 63105

Re: Eagle Forum - Key Man Insurance

Dear Steve:

According to Note 9 to the Eagle Forum Financial Statement dated May 12, 2016, at the time of her death, Phyllis Schlafly was insured under key man life insurance policies, which were owned and paid for by Eagle Forum. The total death benefit under the life insurance policies was \$3,410,000.

Please provide us with a copy of the life insurance policies and an update on the status of Eagle Forum's claims for benefits thereunder, including the claim numbers, contact information for the insurance companies, and any other information you believe may be relevant to the status of Eagle Forum's claims for benefits.

Sincerely yours,

Erik O. Solverud

EOS/mmd

SL 2071878.1



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File No. 5024751-0003

September 28, 2016

VIA ELECTRONIC MAIL

Stephen R. Clark
Joel Rohlf
Runnymede Law Group
7733 Forsyth Blvd., Suite 625
St. Louis, MO 63105

Re: Eagle Forum

Dear Steve and Joel:

In light of the recently obtained information regarding the eagleforum.org domain name, please immediately confirm that appropriate actions have been taken by Eagle Forum and its purported counsel, the Runnymede Law Group, to preserve and protect the integrity of the Paradox database and all other databases, membership lists, mailing lists or other lists used to send mass mailings, emails and/or robocalls.

Also, in light of your refusals to make Liz Miller, whom we understand to be the web master and individual primarily responsible for maintenance of the Eagle Forum web site and the Paradox database, we intend to serve her with a subpoena to take her deposition.

Again, time is of the essence. Please provide us with a report detailing what has been done to preserve and protect the integrity of the Paradox database by the close of business today.

Your anticipated prompt attention to this matter is greatly appreciated by the majority of the directors of Eagle Forum.

Sincerely yours,

Erik O. Solverud

WA 8726595.1



SpencerFane

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esolverud@spencerfane.com

File No. 5024751-0003

September 28, 2016

VIA ELECTRONIC MAIL

Stephen R. Clark
Joel Rohlf
Runnymede Law Group
7733 Forsyth Blvd., Suite 625
St. Louis, MO 63105

Re: Eagle Forum

Dear Steve and Joel:

We recently learned that, on or about September 26, 2016, the registered owner of the eagleforum.org domain name was changed from Eagle Forum to Eagle Trust Fund. Attached you will find copies of domain registrant reports reflecting the purported change. Not surprisingly, the Eagle Forum Board of Directors was not advised of, and did not authorize, any such transfer or change in ownership. To the extent Ed Martin and/or John Schlafly participated in, had knowledge of or were involved with such action, their conduct constitutes an egregious breach of their fiduciary duties and obligations owed to Eagle Forum, and a violation of the Court's Temporary Restraining Order.

Our clients, constituting the majority of directors of the Eagle Forum Board, fully expects the Runnymede Law Group to immediately take all steps necessary to address this conduct and preserve and protect Eagle Forum's ownership and use of the eagleforum.org domain name. Time is of the essence. Please provide us with a report detailing how you intend to address this issue as purported counsel to Eagle Forum by close of business today.

In the meantime, our clients will continue to evaluate their options for dealing with this unfortunate situation in the context of the ongoing litigation.

Sincerely yours,

Erik O. Solverud

WA 8726181.1

Showing results for: EAGLEFORUM.ORG
Original Query: eagleforum.org

Contact Information

Registrant Contact

Name: Eagle Forum
Organization: Eagle Forum
Mailing Address: 322 State St.
Room 301, Alton Illinois 62002 US
Phone: +1.9999999999
Ext:
Fax:
Fax Ext:
Email: eagle@eagleforum.org

Admin Contact

Name: Liz Miller
Organization: Eagle Forum
Mailing Address: 322 State St.
Ste. 301, Alton Illinois 62002 US
Phone: +1.6184625415
Ext:
Fax:
Fax Ext:
Email: eagle@eagleforum.org

Tech Contact

Name: Liz Miller
Organization: Eagle Forum
Mailing Address: 322 State St.
Room 301, Alton Illinois 62002 US
Phone: +1.6184625415
Ext:
Fax:
Fax Ext:
Email: eagle@eagleforum.org

Registrar

WHOIS Server:
URL: <http://www.godaddy.com>
Registrar: GoDaddy.com, LLC
IANA ID: 146
Abuse Contact Email:
Abuse Contact Phone:

Status

Domain Status: clientDeleteProhibited
<https://icann.org/epp/#clientDeleteProhibited>
Domain Status: clientRenewProhibited
<https://icann.org/epp/#clientRenewProhibited>
Domain Status: clientTransferProhibited
<https://icann.org/epp/#clientTransferProhibited>
Domain Status: clientUpdateProhibited
<https://icann.org/epp/#clientUpdateProhibited>

eagleforum.org

Updated Date: 2016-05-25T10:06:44Z
Registration Expiration Date:



ANYA NS.CLOUDFLARE.COM

Raw WHOIS Record

```
Domain Name: EAGLEFORUM.ORG
Domain ID: D26340-LROR
WHOIS Server:
Referral URL: http://www.godaddy.com
Updated Date: 2016-05-25T10:06:44Z
Creation Date: 1996-05-25T04:00:00Z
Registry Expiry Date: 2017-05-24T04:00:00Z
Sponsoring Registrar: GoDaddy.com, LLC
Sponsoring Registrar IANA ID: 146
Domain Status: clientDeleteProhibited https://icann.org/epp/#clientDeleteProhibited
Domain Status: clientRenewProhibited https://icann.org/epp/#clientRenewProhibited
Domain Status: clientTransferProhibited https://icann.org/epp/#clientTransferProhibited
Domain Status: clientUpdateProhibited https://icann.org/epp/#clientUpdateProhibited
Registrant ID: CR78478538
Registrant Name: Eagle Forum
Registrant Organization: Eagle Forum
Registrant Street: 322 State St., Room 301
Registrant City: Alton
Registrant State/Province: Illinois
Registrant Postal Code: 62002
Registrant Country: US
Registrant Phone: +1.9999999999
Registrant Phone Ext:
Registrant Fax:
Registrant Fax Ext:
Registrant Email: eagle@eagleforum.org
Admin ID: CR78478558
Admin Name: Liz Miller
Admin Organization: Eagle Forum
Admin Street: 322 State St., Ste. 301
Admin City: Alton
Admin State/Province: Illinois
Admin Postal Code: 62002
Admin Country: US
Admin Phone: +1.6184625415
Admin Phone Ext:
Admin Fax:
Admin Fax Ext:
Admin Email: eagle@eagleforum.org
Tech ID: CR78478542
Tech Name: Liz Miller
Tech Organization: Eagle Forum
Tech Street: 322 State St., Room 301
Tech City: Alton
Tech State/Province: Illinois
Tech Postal Code: 62002
Tech Country: US
Tech Phone: +1.6184625415
Tech Phone Ext:
Tech Fax:
Tech Fax Ext:
Tech Email: eagle@eagleforum.org
Name Server: FRED.NS.CLOUDFLARE.COM
Name Server: ANYA.NS.CLOUDFLARE.COM
DNSSEC: unsigned
>>> Last update of WHOIS database: 2016-09-26T13:50:24Z <<<
```

Showing results for: EAGLEFORUM.ORG
Original Query: eagleforum.org

Contact Information

Registrant Contact

Name: John Schiefly
Organization: Eagle Trust
Mailing Address: 322 State St Ste
301, Alton Illinois 62002 US
Phone: +1 6184625415
Ext:
Fax:
Fax Ext:
Email: eagle@eagletrust.org

Admin Contact

Name: John Schiefly
Organization: Eagle Trust
Mailing Address: 322 State St Ste
301, Alton Illinois 62002 US
Phone: +1 6184625415
Ext:
Fax:
Fax Ext:
Email: eagle@eagletrust.org

Tech Contact

Name: John Schiefly
Organization: Eagle Trust
Mailing Address: 322 State St Ste
301, Alton Illinois 62002 US
Phone: +1 6184625415
Ext:
Fax:
Fax Ext:
Email: eagle@eagletrust.org

Registrar

WHOIS Server:
URL: http://www.godaddy.com
Registrar: GoDaddy.com, LLC
IANA ID: 146
Abuse Contact Email:
Abuse Contact Phone:

Status

Domain Status: clientDeleteProhibited
https://icann.org/epp#clientDeleteProhibited
Domain Status: clientRenewProhibited
https://icann.org/epp#clientRenewProhibited
Domain Status: clientTransferProhibited
https://icann.org/epp#clientTransferProhibited
Domain Status: clientUpdateProhibited
https://icann.org/epp#clientUpdateProhibited

eagleforum.org

Updated Date: 2016-05-25
Created Date: 1996-05-25
Registration Expiration Date:



NS: PREDNS.CLOUDFLARE.COM
NS: ARYA.NS.CLOUDFLARE.COM

Raw WHOIS Record

Domain Name: EAGLEFORUM.ORG
Domain ID: D26340-LROR
WHOIS Server:
Referral URL: http://www.godaddy.com
Updated Date: 2016-05-25T10:06:44Z
Creation Date: 1996-05-25T04:00:00Z
Registry Expiry Date: 2017-05-24T04:00:00Z
Sponsoring Registrar: GoDaddy.com, LLC
Sponsoring Registrar IANA ID: 146
Domain Status: clientDeleteProhibited https://icann.org/epp#clientDeleteProhibited
Domain Status: clientRenewProhibited https://icann.org/epp#clientRenewProhibited
Domain Status: clientTransferProhibited https://icann.org/epp#clientTransferProhibited
Domain Status: clientUpdateProhibited https://icann.org/epp#clientUpdateProhibited
Registrant ID: CR78478538
Registrant Name: John Schiefly
Registrant Organization: Eagle Trust
Registrant Street: 322 State St Ste 301
Registrant City: Alton
Registrant State/Province: Illinois
Registrant Postal Code: 62002
Registrant Country: US
Registrant Phone: +1.6184625415
Registrant Phone Ext:
Registrant Fax:
Registrant Fax Ext:
Registrant Email: eagle@eagletrust.org
Admin ID: CR78478550
Admin Name: John Schiefly
Admin Organization: Eagle Trust
Admin Street: 322 State St Ste 301
Admin City: Alton
Admin State/Province: Illinois
Admin Postal Code: 62002
Admin Country: US
Admin Phone: +1.6184625415
Admin Phone Ext:
Admin Fax:
Admin Fax Ext:
Admin Email: eagle@eagletrust.org
Tech ID: CR78478542
Tech Name: John Schiefly
Tech Organization: Eagle Trust
Tech Street: 322 State St Ste 301
Tech City: Alton
Tech State/Province: Illinois
Tech Postal Code: 62002
Tech Country: US
Tech Phone: +1.6184625415
Tech Phone Ext:
Tech Fax:
Tech Fax Ext:
Tech Email: eagle@eagletrust.org
Name Server: PREDNS.CLOUDFLARE.COM
Name Server: ARYA.NS.CLOUDFLARE.COM
DNSSEC: unsigned
>>> last update of WHOIS database: 2016-09-28T12:10:40Z <<<

Gregg, Arthur

From: Gregg, Arthur
Sent: Friday, September 30, 2016 10:47 AM
To: Joel Rohlif; Steve Clark
Cc: Meadows, Megan; Solverud, Erik
Subject: RE: Anne Cori, et al. v Edward Martin, et al. - Eagle Forum

Joel –

Your response is troubling on multiple fronts. Counsel for Ed Martin, John Schlafly and Eagle Trust Fund do not owe fiduciary duties to Eagle Forum. As purported counsel to Eagle Forum, Runnymede Law Group does. Barry Noeltner's e-mail makes clear that Ed Martin and John Schlafly were involved with the transfer in ownership of the domain name. Moreover, the transfer clearly benefits Eagle Trust Fund. Runnymede Law Group cannot simply delegate its obligations to those parties' counsel because it may well be that, with regard to this transfer, those parties' interests are directly adverse to Eagle Forum's.

This message will confirm that, notwithstanding multiple requests and the passage of more than 24 hours, the Runnymede Law Group has not provided any information to our clients regarding *its* efforts to investigate and address this issue as purported counsel to Eagle Forum. Please immediately provide us with a report outlining how *you* plan to address this transfer.

Arthur Gregg Attorney at Law
Spencer Fane LLP

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O 314.333.3914
agregg@spencerfane.com | spencerfane.com

From: Joel Rohlif [mailto:jrohlif@RunnymedeLaw.com]
Sent: Friday, September 30, 2016 9:43 AM
To: Solverud, Erik; Steve Clark
Cc: Meadows, Megan; Gregg, Arthur
Subject: RE: Anne Cori, et al. v Edward Martin, et al. - Eagle Forum

Erik-

To follow up on this. We reached out to counsel for Ed Martin, John Schlafly, and Eagle Trust Fund regarding the change. We understand that they reached out directly.

Thanks,

Joel

Joel D. Rohlf

Counsel

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St. Louis, MO 63105
314-332-2980 (Direct)
202-580-9151 (Cell)

jrohlf@RunnymedeLaw.com

RUNNYMEDE
law group

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www.RunnymedeLaw.com

Click here to add [Joel Rohlfs business card](#) to your address book.

From: Solverud, Erik [<mailto:esolverud@spencerfane.com>]
Sent: Wednesday, September 28, 2016 6:31 PM
To: Joel Rohlfs; Steve Clark
Cc: Meadows, Megan; Gregg, Arthur
Subject: RE: Anne Cori, et al. v Edward Martin, et al. - Eagle Forum

Again, please advise what, if anything, has already been done by Runnymede Law Group to address this matter so that we can ensure that adequate steps are being taken to preserve and protect Eagle Forum's rights and property. Surely, Runnymede Law Group is not disputing my clients' entitlement to this information as members of the Eagle Forum Board of Directors.

Erik O. Solverud Attorney at Law
Spencer Fane LLP

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O 314.333.3904 | C 314.803.3548 | F 314.862.4656
esolverud@spencerfane.com | spencerfane.com

From: Joel Rohlfs [<mailto:jrohlf@RunnymedeLaw.com>]
Sent: Wednesday, September 28, 2016 6:28 PM
To: Solverud, Erik; Steve Clark
Cc: Meadows, Megan; Gregg, Arthur
Subject: RE: Anne Cori, et al. v Edward Martin, et al. - Eagle Forum

Erik-

We disagree regarding the time frame and will proceed accordingly.

Thanks,

Joel

Joel D. Rohlfs

Counsel

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Click here to add [Joel Rohlfs business card](#) to your address book.

From: Solverud, Erik [<mailto:esolverud@spencerfane.com>]
Sent: Wednesday, September 28, 2016 4:33 PM
To: Joel Rohlff; Steve Clark
Cc: Meadows, Megan; Gregg, Arthur
Subject: RE: Anne Cori, et al. v Edward Martin, et al. - Eagle Forum

Joel –

Runnymede Law Group holds itself out as counsel to Eagle Forum. It owes Eagle Forum fiduciary duties. Given the time-sensitive nature of this matter, five hours is not an unreasonable time frame.

Please advise what steps Runnymede Law Group has taken to address this matter. In the meantime, we will look forward to your follow up report on this matter.

Erik O. Solverud Attorney at Law
Spencer Fane LLP

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From: Joel Rohlff [<mailto:jrohlff@RunnymedeLaw.com>]
Sent: Wednesday, September 28, 2016 4:10 PM
To: Delaney, Michelle; Steve Clark
Cc: Solverud, Erik; Meadows, Megan; Gregg, Arthur
Subject: RE: Anne Cori, et al. v Edward Martin, et al. - Eagle Forum

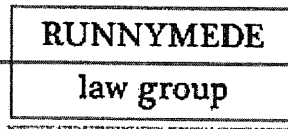
Erik-

I received the letter you sent today regarding the registration of eagleforum.org. We were not aware of any registration change until your letter. As such, we could not adequately investigate and respond to your request in the five-hour deadline you unilaterally set. To the extent we obtain additional relevant information, we will follow up with you. And please cease making demands for immediate action in unreasonable time frames.

Thanks,

Joel

Joel D. Rohlff
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Click here to add [Joel Rohlff business card](#) to your address book.

From: Delaney, Michelle [mailto:⁷⁷¹⁴⁶⁵MMDelaney@spencerfane.com]
Sent: Wednesday, September 28, 2016 11:48 AM
To: Steve Clark; Joel Rohlf
Cc: Solverud, Erik; Meadows, Megan; Gregg, Arthur
Subject: Anne Cori, et al. v Edward Martin, et al. - Eagle Forum

Gentlemen,

Attached please find correspondence regarding the above-referenced matter.

Michelle M. Delaney Legal Administrative Assistant
Spencer Fane LLP

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